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(filed)

April 13, 1988

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VIA FEDERAL EXPRESS

Mr. Michael Towle
Compliance Officer
PA CERCLA Remedial Enforcement Section
(3HW12)
U.S. Environmental Protection Agency
841 Chestnut Street, 6th Floor
Philadelphia, PA 19017

RECEIVED

CERCLA REMEDIAL ENFORCEMENT SECTION

APR 14 1988

EPA-Region III

Re: Keystone Sanitation Company Landfill

Dear Mr. Towle:

This letter is sent on behalf of Arcata Graphics Fairfield, Inc. which has been identified by EPA as a PRP at the referenced site. Arcata Graphics Fairfield has denied, and continues to deny, that it is a PRP. Nevertheless, without waiving any rights or defenses, Arcata Graphics Fairfield respectfully submits that the February, 1988 RI/FS Work Plan proposed for the referenced site is overly broad and fails to adequately incorporate the investigative work already performed at the site by Keystone and others. This point is illustrated by many of the comments to the Work Plan submitted by Buehart Horn, Inc. on behalf of Keystone Sanitation Co., Inc. dated April 5, 1988. In short, the vast majority of the costs that must be incurred to perform the RI/FS in accordance with the proposed Work Plan are not cost-effective, necessary, reasonable, appropriate, or consistent with the National Contingency Plan. In that Keystone is currently addressing any alleged on-site contamination at the site in response to the past investigative work and the Consent Adjudication with the Pennsylvania Department of Environmental Resources, Arcata Graphics Fairfield submits that any further expenditure of

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Mr. Michael Towle
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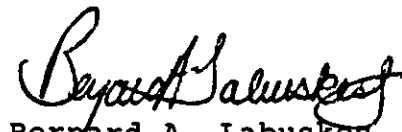
funds at the site pursuant to the requirements of CERCLA would not be cost-effective, necessary, or consistent with the National Contingency Plan.

Thank you for your attention.

Sincerely,

McNEES, WALLACE & NURICK

By



Bernard A. Labuskes, Jr.

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(Red)

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